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Attorneys for Defendant Meta Platforms, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

IN RE META PIXEL TAX FILING CASES

Case No. 5:22-cv-07557-PCP (VKD)

This Document Relates To:

**[PROPOSED] ORDER GRANTING
DEFENDANT'S ADMINISTRATIVE
MOTION TO FILE DOCUMENTS UNDER
SEAL**

All Actions

Hon. P. Casey Pitts

Having considered the Administrative Motion to File under Seal, filed by Plaintiffs on December 15, 2025, and the Declaration of Lauren R. Goldman, filed by Meta Platforms, Inc. on January 12, 2026, pursuant to Civil Local Rule 79-5, all materials submitted in support thereof, and other records on file, and having found that good cause exists for the sealing of the documents listed below:

IT IS HEREBY ORDERED that parts of Plaintiffs' Reply in Support of Class Certification and the exhibits filed in support thereof ("Reply and Exhibits"), which were filed on December 12, 2026 be **SEALED** as outlined below. Accordingly, the public shall only have access to the version of the Reply and Exhibits:

Document	Portions to be Sealed	Designating Party	Reason for Redaction
Exhibit 4 (highlighted in Dkt. No. 265)	Parts of page 15, paragraph 40; page 18, paragraph 44.	Meta	This text should be redacted because it reveals specific, non-public information about Meta's proprietary data storage systems, including the names of specific fields. If this information were disclosed, it would competitively harm Meta and allow bad actors to undermine the integrity of Meta's systems.
Exhibit D to Exhibit 4 (highlighted in Dkt. No. 265)	Entire exhibit.	Meta	This text should be redacted because it reveals specific, non-public information about Meta's proprietary data storage systems, including the names and meaning of specific fields. If this information were disclosed, it would competitively harm Meta and allow bad actors to undermine the integrity of Meta's systems.
Exhibit E to Exhibit 4 (highlighted in Dkt. No. 265)	Entire exhibit.	Meta	This text should be redacted because it reveals specific, non-public information about Meta's proprietary data storage systems, including the names and meaning of specific fields. If this information were disclosed, it would competitively harm Meta and allow bad actors to undermine the integrity of Meta's systems.
Exhibit F to Exhibit 4	Entire exhibit.	Meta	This text should be redacted because it reveals specific, non-public information about Meta's proprietary

(highlighted in Dkt. No. 265)			data storage systems, including the names and meaning of specific fields. If this information were disclosed, it would competitively harm Meta and allow bad actors to undermine the integrity of Meta's systems.
Exhibit G to Exhibit 4 (highlighted in Dkt. No. 265)	Entire exhibit.	Meta	This text should be redacted because it reveals specific, non-public information about Meta's proprietary data storage systems, including the names and meaning of specific fields. If this information were disclosed, it would competitively harm Meta and allow bad actors to undermine the integrity of Meta's systems.
Exhibit L to Exhibit 4 (highlighted in Dkt. No. 265)	Parts of page 1, rows 11-12, 15-16, 19-20.	Meta	This text should be redacted because it reveals specific, non-public information about Meta's proprietary data storage systems, including the names of specific fields. If this information were disclosed, it would competitively harm Meta and allow bad actors to undermine the integrity of Meta's systems.
Exhibit P to Exhibit 4 (highlighted in Dkt. No. 265)	Parts of page 1, rows 7, 17, 27, 35.	Meta	This text should be redacted because it reveals specific, non-public information about Meta's proprietary data storage systems, including the names of specific fields. If this information were disclosed, it would competitively harm Meta and allow bad actors to undermine the integrity of Meta's systems.
Exhibit O to Exhibit 4 (highlighted in Dkt. No. 265)	Parts of page 9, line 6.		This text should be redacted because it reveals specific, non-public information about Meta's proprietary data storage systems, including the names of a specific Hive table. If this information were disclosed, it would competitively harm Meta and allow bad actors to undermine the integrity of Meta's systems.
Exhibit Q to Exhibit 4 (highlighted in Dkt. No. 265)	Parts of page 1, rows 6, 31.	Meta	This text should be redacted because it reveals specific, non-public information about Meta's proprietary data storage systems, including the names of specific fields. If this information were disclosed, it would

			competitively harm Meta and allow bad actors to undermine the integrity of Meta's systems.
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Dated: _____

P. Casey Pitts
United States District Court Judge